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Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Restructuring the Amateur)	WT Docket 98-143
Radio Service)	

COMMENTS BY GORDON WEST, WB6NOA
AND GORDON WEST RADIO SCHOOL, INC., ON RESTRUCTURING
OF THE AMATEUR SERVICE

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FEDERAL COMMUNICATIONS COMMISSION

INTRODUCTION

These comments are filed on behalf of Gordon West, WB6NOA, an Extra class licensed amateur operator, and Gordon West Radio School, Inc. Our comments will address specific FCC proposals to modify the amateur radio service rules as follows:

- A. Reduction of the number of license classes
- B. Provide greater opportunities to volunteer examiners to participate in the examination process
- C. Ideas for improving the Commission's enforcement processes
- D. Comments on changes to the telegraphy requirements
- E. Comments to change written examination requirements

We do not have the background to comment on the elimination of the RACES licenses. Also, we will not comment on the disposition of various routine and repetitive petitions.

We appreciate this opportunity to offer our comments on behalf of my own personal feelings, plus the comments I have received from hundreds of students and fellow hams.

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BACKGROUND

I have been a licensed amateur operator for over 30 years, originally holding call sign WN6TWJ. I hold an original FCC-issued First Class Radiotelephone license with radar endorsement, and presently hold the lifetime GROL with radar endorsement. I have worked in the past with the Federal Communications Commission on magazine articles I have written, and in the early days of CB radio, I cooperated closely with the late Jerry Freeman. I have written many positive stories about the FCC, and in years past I've had the opportunity to visit the Commission in Washington to develop new articles.

I hold a State of California teaching credential, and I am a member of the American Radio Relay League, Quarter Century Wireless Association, and I am a Fellow of the Radio Club of America.

Our business organization, Gordon West Radio School, Inc., offers ham radio training materials from Novice through Extra class. These consist of books, audio cassettes, video cassettes, and classroom "live" instruction. Our courses are sold by Radio

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Shack, the W5YI Group, independent ham radio dealers, and ham radio chains such as Ham Radio Outlet and Amateur Electronics Supply. It has been said that one out of every two hams have used Gordon West Radio School training materials for license upgrading.

The Gordon West Radio School materials are published by Master Publishing in the Chicago, Illinois area. We work closely with our publisher, so some of our comments will address the impact the rules may have on existing training materials in the marketplace.

Gordon West Radio School also supports all of the activities of the National Conference of Volunteer Examination Coordinators (NCVEC), and without compensation we regularly travel to their yearly meetings to offer our support in the redesign of changing questions in the various question pools. We make every effort to assist in new questions that may be offered for the new pools.

Most important is our daily contact with licensed amateur operators throughout the United States. Amateur operators have a direct phone line to me at my home/office in California. They call regularly to voice their opinions about the upcoming proposed rule changes.

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We also teach weekend training seminars based on home study ahead of time. An upcoming seminar will have close to 90 applicants, so we work closely with the questions and comments coming from potential ham operators who have not passed any of the license tests before class.

I also travel throughout the United States presenting ham radio training and convention seminars, and this also gives me exposure to licensed hams who have strong opinions about the upcoming proposals.

And based on all of this input, Gordon West and Gordon West Radio School, Inc., will offer the following comments to your Notice of Proposed Rulemaking WT Docket 98-143.

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REDUCTION OF NUMBER OF LICENSE CLASSES

We recommend the entry-level class as Technician No-Code, Element 3A, consisting of the current merged Elements 2 and 3A question pools. The Technician examination would consist of 50 VHF oriented questions from a pool of 500 questions (the 10X rule). The Technician operator would be granted present privileges from 50 MHz on up.

The second license up would be General class, and this would afford all of the present General class privileges, but at a code test requirement speed of 5 wpm. The written examination would consist of 50 questions from a 500-question pool, many taken from the present General class question pool.

The highest grade of amateur license would be Extra class, with all of the privileges now afforded to Advanced and Extra class operators. We would recommend leaving the Extra class code speed at 20 wpm. The written examination would contain 100 technically oriented questions, also including questions about how to administer amateur examinations.

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We feel that 3 licenses would serve the amateur community well--
Technician, General, and Extra class.

VOLUNTEER EXAMINERS

We concur with the idea of allowing the next higher grade license to conduct examinations to a license class at least one class below. This means the combined Advanced/Extra class licensee could conduct General class exams. We would like to see that General class examiners would still be permitted to conduct the entry-level (new) Technician class examinations.

ENFORCEMENT

We would hope to see the Commission take a more active role in amateur rule violation enforcement. We support any proposal that could allow us to rid our airwaves of obvious rule violators, whether they be licensed hams or not. Whatever it takes to bring back some law and order on certain ham frequencies, we would want to support this action.

TELEGRAPHY TESTS

We are in full agreement that CW examinations have played too important a role in license and privilege upgrades. For access

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on General class frequencies, we feel that knowledge of the Morse Code is all that is necessary at a rate of 5 wpm.

We would like to see the 5 wpm test structure be left up to individual volunteer examination teams. Instead of a specific type of 5 wpm test, and against one minute of solid copy or 7 out of 10 questions answered correctly, we would like to see volunteer examination teams create their own 5 wpm General class CW testing procedures.

It would be up to the individual team members to certify an examinee of having passed the code in order to begin operating CW on General class frequencies. This could be a sending test, a receiving test, knowledge of the Morse Code, points given for proper hand position, points awarded for knowing Morse Code operating abbreviations, etc. Let the examiners develop their own type of code test, and let the applicants seek out those examination teams who they feel might give them a code test they think they can pass. In other words, demonstrate the capability of using the code on the air, as opposed to a 5-minute "pressure cooker" test where many minds go blank who really do know the code relatively well.

The same would hold true for the 20 wpm code test. Leave it up to the individual examination team on how they might structure

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And the reason we think that the Extra class CW should be left at 20 wpm would be a salute to the many Extra class operators who have mastered the skill at this speed, and an enticement for those hams who may wish to give the Extra class license all of their efforts for the increased exclusive use of CW sub-bands. Let's maintain our ultimate Extra class CW standards as high as they are, and not reduce them down to slower speeds. This will continue to attract high-speed CW operators who may become a vital communicator when emergency conditions set in and CW is the only mode that might get through.

WRITTEN EXAMINATION

We feel that standardized Technician, General, and Extra class written examinations are necessary, and many of the present test questions and answers are on-target to be employed in upcoming exams. The Technician would take a merging of present Elements 2 and 3A. General would remain almost unchanged, and Extra class would merge the Element 4A and 4B pools and double in total number of questions.

We would also like to see a more practical "test" of each applicant who may be asked to demonstrate a specific area of amateur radio. I believe that volunteer examination systems, tired of seeing unqualified applicants simply memorize test

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books, would like to see that applicant be prepared for an additional test of using ham radio for real.

But unfortunately, volunteer examiners don't have much time to conduct the testing process, so maybe we let other ham elmers who are accredited volunteer examiners issue "endorsements" to the applicant before the written test is taken. Maybe the applicant needs 5 "endorsements" for the beginning examination:

1. Solder a coaxial cable plug
2. Program a handheld of HF radio with memory channels
3. Construct a simple circuit using supplied components
4. Turn in a log book full of completed contacts for an upgrade
5. Bring in a log sheet describing activities in ham radio

These endorsements might resemble what it takes to pass FAA pilot exams. Besides just passing the written examination, volunteer examiners as well as training schools would hold specific sessions to double-check the applicant really knows how to take advantage of the license that they may soon pass. I think the FAA exams and required "hours" for a certain license might be a good place to research how we might do this. If this plan seems feasible, I would be first to help work up an endorsement syllabus.

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We also need to insure that we don't quickly change question pools before publishers have had an opportunity to schedule out their print runs, and dealers and distributors have had an opportunity to move existing inventories of training materials stock. It would be a financial hardship to change training books in mid-stream. It also would take tremendous amounts of time by the NCVEC to develop new questions.

SUMMARY

Gordon West Radio School would like to see 6 classes of license streamlined into 3--Technician without any code test, General with a 5 wpm code test, and Extra with the 20 wpm test. We would like to see code tests developed by individual volunteer examination teams, and eliminate "strict copy" rules.

We have received hundreds of comments from no-code students who indicate they would not learn the code for General class frequencies at 13 wpm because they felt it would take too much time, and the code tests at 13 wpm were too strict. But now that the code test may come down to 5 wpm and maybe taken on a practical basis, we see hundreds of our students and thousands of retail buyers NOW LEARNING THE CODE WHEN THEY WOULDN'T DO IT BEFORE! So for those amateurs who may feel we are doing away with code teaching, actually the 5 wpm test for General is

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INCREASING the number of new hams that will begin LEARNING THE CODE. Who knows--when the smoke finally clears, we may find actually more people doing the code than ever before since code requirements may be going from 13 wpm down to 5 wpm practical testing for General class privileges.

We also feel that present Technician no-code operators as well as Technician-Plus operators who have not taken the General written examination MUST take the General written examination to acquire the new General class privileges. Only those Technician class operators licensed prior to March of 1987 would be exempted. This gives us a good opportunity to encourage the present no-code Technician class operator to sharpen their theory skills to take advantage of new privileges. It's also important that part of our new General class test questions cover the General class frequency allocations.

We strongly feel that Q & A exams are still appropriate, but we would like to see practical "hours" be turned in as an endorsement for the issuing of the beginner license or upgrade. This would allow more hams to "elmer" beginners into our hobby, and it would force beginners to do more work than just reading our Q & A books. In fact, our books would contain pullout pages that the students would need to complete and have signed off by that accredited elmer. This could be pattern much like what Boy

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Scouts must do to earn merit badges. We feel the ham community will be behind this proposal because they will get more involved in teaching newcomers about THEIR very special aspect of the hobby.

For instance, a student needing just one more endorsement might go over to a ham operator moonbounce station, learn a little bit about the excitement of banging high-power signals off the moon, learn all about RF safety, and see what it takes to get a thrill of hearing your voice come back a half second later. Once the candidate spends a few hours at the moonbounce station, the accredited elmer could then sign him/her off, and this is just one more way of showing the practical aspect of ham radio to those needing the necessary endorsements to go along with their written exam.

This whole idea gets more hams involved with our hobby, so for those hams that think we may be "dummying down" the service, they will actually see we are streamlining it and the only "dummies" will be those present hams who don't want to join in as an elmer and help our service grow.

I could also see this "endorsement" helping occupy our unused microwave bands. If we don't use these frequencies, we know we could lose them. I would see ham microwave organizations

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attracting newcomers to fulfill their required endorsements by learning how to turn a door opener into a medium-range 10 GHz communicator, and this could develop into increased activity on the higher bands. It would also give the microwave enthusiast first grabs on new operators and those wishing to upgrade that might otherwise not be familiar what happens above 1296 MHz!

We hope the Commission will indeed increase enforcement activities. If it needs to be privatized, so be it. But we need some sort of enforcement action so that ham renegades won't see the lack of enforcement as a green light to trash our valuable ham frequencies with their abusive language, unlicensed operation, illegal sounds from tone/music generators, and the like. We must nip this problem in the bud, and that means enforcement efforts right now.

Finally, keep in mind the economic impact of all decisions. Lowering the CW speed will increase the number of high-frequency transceivers sold. This will increase accessory sales, plus antenna sales. This will increase the number of people on ham bands, and this will hold our frequencies. It will also promote more general activity on all frequencies as they become more active with their local ham radio club.

Amateur equipment and accessory manufacturers are barely clinging

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to any profit in this industry, and a reduction of the code speed and streamlining of the service will help stimulate the growth of ham radio.

We must be cautious we don't injure those publishers and dealers holding a year's stock of training materials that could instantly out of date. We need to see what's out there when it comes to the contents of the question pools, and see what might be salvaged so during the transition period students could cherry-pick existing stock and would not have to scrap a publication that they may have just purchased 2 months before. Also, the question pool committee of the NCVEC has already issued effective and expiration dates for publications, and we would want to support the NCVEC in every way possible because of the tremendous amount of time they volunteer for the creation of question pools and the administration of the amateur exams, plus their extraordinary efforts of electronic filing.

Thank you for this opportunity to address your proposal for rulemaking, and we hope to stay actively involved in our pursuit to continuously support the amateur service as not only a hobby, but an important resource to the United States when traditional communications could fail in time of disaster. We hope our trained operators will come to the assistance of their country at anytime with their amateur radio communications devices.